

Case No: 12-70424-HDH-13

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF TEXAS

Dallas Division

In re: NANCY JEAN ROBINETTECase No: 12-70424-HDH-13Chapter: 13Property Address: 1 RAIN LILY COURT, WICHITA FALLS, TX 76310-3607Last four digits of any number you use to
Identify the Debtor's account: 1037Court Claim No. (if known) 4-3**STATEMENT IN RESPONSE TO NOTICE OF AMOUNT DEEMED NECESSARY TO CURE
MORTGAGE ARREARS UNDER L.B.R. 3002-2**WELLS FARGO BANK, N.A. AS SERVICING AGENT FOR HSBC BANK USA, NATIONAL ASSOCIATION AS TRUSTEE
FOR GSMPS MORTGAGE LOAN TRUST 2005-RP1 ITS ASSIGNS AND/OR SUCCESSORS IN INTEREST("Creditor") hereby responds to that certain Statement in Response to Notice of Amount Deemed Necessary to Cure Mortgage Arrears ("Cure Notice") dated July 24, 2014 and filed as Docket 29.**Pre-Petition Amounts
Received**

Applicable option is checked

☒ Agrees that the Trustee has paid the amounts listed on the Cure Notice towards the Creditor's claim.☐ Disagrees that the Trustee has paid the amounts listed on the Cure Notice towards Creditor's claim. Creditor states that the total amount received as of the date of the Cure Notice is:Total Amount Due: \$0.00

Attached is an itemized Statement of amounts paid through the date listed on the Statement.

**Post-Petition Amounts
Outstanding**

Applicable option is checked

☐ Agrees that Debtors are current with respect to all post-petition payments, fees and costs, whether paid directly to Creditor or being paid through Debtor's Chapter 13 Plan as of the date of the Cure Notice.☒ Disagrees that Debtors are current with respect to all post-petition payments, fees and costs as of the date of the Cure Notice and states that the total amount to cure the post-petition arrearage is:Total Amount Due: \$3,335.10*

Attached is an itemized Statement of the post-petition arrearage due and owing through the date listed on the Statement. The outstanding amounts identified on the Statement do not reflect amounts that became or may become due after the date listed therein, including any fees that may have been incurred in the preparation, filing or prosecution of this Cure Notice.

The outstanding amounts identified on the attached Statements may not, due to timing, reflect all payments sent to Creditor as of the date stated therein. In addition, the amounts due may include payments reflected on the Notice of Amount Deemed Necessary to Cure Mortgage Arrears but which have not yet been received and/or processed by Creditor.

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X /s/ ABBEY ULSH
Signature

X 09/04/2014
Date (MM/DD/YYYY)

First Name: **ABBIEY**

Middle Name:

Last Name: **ULSH**

Title: **Attorney**

Company **BARRETT DAFFIN FRAPPIER TURNER & ENGEL, LLP**

Address **15000 SURVEYOR BLVD SUITE 100**

City **ADDISON**

State: **TX**

Zip: **75001**

Phone **(972) 386-5040**

UNITED STATES BANKRUPTCY COURT

CERTIFICATE OF SERVICE

I hereby certify that on September 04, 2014, a true and correct copy of the Statement in Response to Notice of Amount Deemed Necessary to Cure Mortgage Arrears Under L.B.R. 3002-2 was served via electronic means as listed on the Court's ECF noticing system or by regular first class mail to the parties listed on the attached list.

Respectfully submitted,

BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP

BY: /s/ ABBEY ULSH 09/04/2014
ABBHEY ULSH
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ATTORNEY FOR CLAIMANT

UNITED STATES BANKRUPTCY COURT

BY ELECTRONIC NOTICE OR REGULAR FIRST CLASS MAIL:

DEBTOR:

NANCY JEAN ROBINETTE
1 RAIN LILY COURT
WICHITA FALLS, TX 76310

NANCY JEAN ROBINETTE
1 RAIN LILY COURT
WICHITA FALLS, TX 76310-3607

DEBTOR'S ATTORNEY:

MONTE J. WHITE
1106 BROOK AVENUE
HAMILTON PLACE
WICHITA FALLS, TX 76301

TRUSTEE:

ROBERT B. WILSON
6308 IOLA AVENUE
LUBBOCK, TX 79424

UNITED STATES TRUSTEE:

1100 COMMERCE STREET
ROOM 976
DALLAS, TX 75242